

UNITED STATES DISTRICT COURT

Northern District of New York

6th Judicial Division

_____)	
JANE DOE, JOHN DOE)	
)	Case No.3:24-cv-274 (MAD/ML)
)	
Plaintiffs)	
)	
-against-)	
)	DECLARATION OF
)	JOHN DOE
)	
JONATHAN REES aka GREG ELLIS)	
aka JOHNATHAN REES aka JONNY REES)	
aka JACOB LORENZO)	
)	
Defendant)	
_____)	

**DECLARATION OF JOHN DOE IN SUPPORT OF MOTION FOR DEFAULT
JUDGMENT**

I, JOHN DOE, declare under penalty of perjury that the foregoing is true and correct:

1. I am the Plaintiff in the above-captioned action and submit this Declaration in support of Plaintiffs Motion for Default Judgment against Defendant Jonathan Rees aka Greg Ellis aka Johnathan Rees aka Jonny Rees aka Jacob Lorenzo.

2. Defendant reaching out to my school and friends via himself and his friends with false information about my mom and dad, has caused me significant harm, embarrassment and bullying.

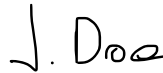
3. I was removed from my School for a significant period of time on two separate occasions while the School investigated the allegations Defendant contacted my School Counselor about. This has disrupted my school work and my ability to graduate with my friends.
4. The video of my mom circulated around my School with my peers screen recording and sharing it to other students, using the video to bully me, my brother and my sister.
5. The stress of being interviewed by CPS Officers more than 6 times, Police showing up at the house multiple times after receiving calls about crimes my mom and my younger brother had allegedly committed, harassed by the Landlord at the time, and kids in my school, all instigated by Defendant, I started to experience bad headaches and the doctor referred me to a neurologist for further investigation. I struggled to cope moving from hotel to hotel while studying for my Regents exams on top of Defendant actively looking for us, that I moved away from my mom and siblings for the rest of the School year, approximately 2 months.
6. I didn't want or expect to leave home before going to college, but I had to, I was getting ill, felt low, bad headaches, that I collapsed two times playing tennis, which has never happened to me before. My mom was devastated by what was happening to me and didn't want me to move away from her, believing I was safer with her given everything that was happening.
7. I did move back with my mom and me and my siblings moved to a new School. We took a lot of precautions to protect ourselves from Defendant and his friends and I started to relax and feel happy again, enjoying my new school in Honor classes, but Defendant located us again and doxed us online. I immediately left School as I did not want to go through the embarrassment again with new friends and other students receiving the videos again and bullying me, calling my mom a killer, an attempted murderer and that my dad sexually abused me, when it's not true.
8. Initially, I planned to return to School after Defendant left us alone and we got back to living like we did prior to meeting Defendant, but I came to the realization this could be years of more of the same from Defendant until he is held accountable and why I choose to graduate early in 11th grade too embarrassed to return to school, choosing a different career path for myself at a lower level college that accepted HSE, boycotting my dreams of being a D1/D2 athlete playing

tennis at a top 4 year college, which I've been playing since I was 4 years old.

9. The Defendant has severely harmed me by his bad acts that cannot be undone for the rest of my life given the digital age. Defendant shared private information he had no right to share about me or members of my family and falsehoods in order to humiliate and harm me, even accusing me of crimes I did not do, attempting to get me arrested like he did to my mom.

10. Defendant made a conscious decision not to plead, answer or otherwise defend my action against him. The party against whom it seeks a judgment of affirmative relief is not an infant, in the military, or an incompetent person. I support the motion for Default Judgment against Jonathan Rees aka Greg Ellis.

Executed on May 13, 2025.

A handwritten signature in black ink that reads "J. Doe". The signature is written in a cursive, slightly stylized font. The "J" is large and loops around the "D". The "Doe" is written in a similar cursive style. The signature is positioned above a horizontal line.

John Doe
Plaintiff